

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>MINING PROJECT WIND DOWN</b>	§	<b>Case No. 22-90273 (MI)</b>
<b>HOLDINGS, INC. (f/k/a Compute North</b>	§	
<b>Holdings, Inc.), et al.,<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	
<b>Debtors.</b>	§	

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**CORPUS CHRISTI ENERGY PARK, LLC's  
WITNESS AND EXHIBIT LIST FOR  
FEBRUARY 16, 2023 CONFIRMATION HEARING**

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Corpus Christi Energy Park, LLC (“CCEP”) files this Witness and Exhibit List for the hearing scheduled for **Thursday, February 16, 2023 at 1:30 p.m. Central Time**, on the confirmation of the *Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a/ Compute North Holdings, Inc) and its Debtor Affiliates* (Dkt. No. 889) and *Final Approval of Disclosure Statement* (as such hearing may be continued or rescheduled, the “Hearing”).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors’ service address for the purposes of these chapter 11 cases is 300 North LaSalle, Suite 1420, Chicago, Illinois 60654.

**WITNESSES**

CCEP may examine on cross or rebuttal:

1. Debtors' representatives and witnesses;
2. Committee's members and witnesses;
3. Steve Quisenberry, representative of CCEP;
4. Matthew Held, representative of CCEP; and
5. Any witness necessary to rebut testimony of a witness called or designated by the Debtors, Committee, or any other party.

**EXHIBITS**

CCEP may offer into evidence any one or more of the following exhibits at the Hearing:

<b>Ex. #</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
1	Redline of Amended Joint Liquidating Chapter 11 Plan of Compute North Holdings and its Debtor Affiliates [Dkt 667-1]				
2	Redline of Disclosure Statement of the Amended Joint Liquidating Chapter 11 Plan of Compute North Holdings and its Debtor Affiliates [Dkt 667-2]				
3	Solicitation version of Debtors' Ch.11 winddown and Ch. 7 liquidation analysis [Dkt 723-2, pp. 128-152]				
4	Plan Supplement, 2nd Amended Schedule of Retained Causes of Action [Dkt. 843-1]				
5	Schedules, CN Corpus Christi, LLC [Dkt. 315]				
6	Corpus Christi Energy Park, LLC's Proof of				

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
	Claim #10057 filed Nov. 12, 2022				
7	Design-Build Contract between Corpus Christi Energy Park, LLC and CN Corpus Christi, LLC <sup>2</sup>				
8	Corpus Christi Energy Park, LLC's Votes/Opt-Outs				
9	Urban Solution Group, LLC Proof of Claim #10028 filed Nov. 22, 2022				
10	Schedules, CN King Mountain, LLC [Dkt. 318]				
11	Pegasus Energy, LLC Proof of Claim #10018 filed Oct. 19, 2022				
12	Sunbelt Solomon Services, LLC Proof of Claim #10146 filed Nov. 23, 2022				
13	Bootstrap Energy, LLC's Proof of Claim #10058 filed Nov. 12, 2022				
14	Bootstrap Energy, LLC's purchase order to Compute North, LLC				
15	Bootstrap Energy, LLC's Votes/Opt-Outs				
16	Order Denying Claim Objection and Imposing				

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<sup>2</sup> This exhibit is not being filed with this list because the contract was subject to a non-disclosure or confidentiality agreement. Debtors and Committee have copies of this document and it is available through CCEP's counsel with copies to be provided at confirmation as agreed to by the parties or directed by the Court.

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
	Additional Relief [Dkt. 861]				

CCEP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing and to present rebuttal witnesses and exhibits. CCEP also cross-designates as an exhibit any document designated or presented at hearing by any other party. CCEP also reserves the right to request judicial notice of any document filed with the Court in this case.

Dated: February 13, 2023.

Respectfully submitted,

By: /s/Mark A. Castillo

Mark A. Castillo

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***Bankruptcy Counsel for  
Corpus Christi Energy Park, LLC***

### **CERTIFICATE OF SERVICE**

The undersigned certifies that, on February 13, 2023, a true and correct copy of the foregoing document was properly served upon the following parties and/or their counsel of record: the Debtors, Official Committee of Unsecured Creditors, parties requesting notice and the U.S. Trustee.

Certified on February 13, 2023.

/s/Robert C. Rowe

Robert C. Rowe